

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Petition for Rulemaking to Amend</b>	)	<b>RM-11355</b>
<b>Rule Section 22.901(b) to Extend</b>	)	
<b>Analog Sunset Date</b>	)	
	)	
<b>Sunset of the Requirement that Cellular</b>	)	<b>WT Docket No. 01-108</b>
<b>Systems Maintain Analog Transmission</b>	)	
<b>Capacity through February 18, 2008,</b>	)	
<b>Rule Section 22.901(b)</b>	)	

**To: The Commission**

**SUPPLEMENT TO PETITION FOR RULE MAKING**

The Alarm Industry Communications Committee (“AICC”) and ADT Security Services, Inc. (“ADT”) (hereinafter collectively the “Petitioners”), by their attorneys and pursuant to Rule Section 1.401,<sup>1</sup> hereby supplement their November 30, 2006 Petition for Rule Making (“Petition”) requesting that the sunset date for the cellular analog (or “AMPS”) transmission requirement of Rule Section 22.901(b) be extended. As discussed below, Petitioners are hereby narrowing their request for relief significantly, in light of the experience they have gained over the past several months as well as feedback from the Commission and the record in this proceeding.

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<sup>1</sup> 47 CFR § 1.401.

**I. The Commission Should Extend The Analog Sunset For An Additional Nine Months In Smaller MSAs.**

The record in this proceeding reflects that there is a vital public interest need to safeguard consumers, businesses and governmental entities using analog alarm radios in electronic security systems intended to help protect them from fire, intruder, medical emergency and carbon monoxide threats. These incumbent analog users must have their AMPS alarm device replaced by a digital replacement unit before the analog service is terminated. Thus far, Petitioners estimate that approximately 50,000 AMPS alarm radios have been replaced, leaving another 950,000 to be switched out by the currently scheduled AMPS sunset date of February 18, 2008. Petitioners project that the alarm industry will be able to convert approximately 350,000 to 450,000 of 950,000 remaining AMPS subscribers (or 37 to 47%) by February 18, 2008, if everything goes right in their replacement efforts. This will leave 500,000 to 600,000 units unconverted.

The replacement process has been slowed, initially by the lack of replacement radios until Spring 2006, then by issues associated with the readiness of cellular systems for the influx of replacement alarm radios in significant numbers. See April 27, 2007 Ex Parte Notice of AICC and attached presentation at Item 5. Now that the issues associated with the cellular systems have been resolved and replacement alarm radios are becoming available in large quantities, Petitioners expect that the alarm industry can increase the pace of analog replacement installations significantly. However, based on industry estimates, it is still expected that approximately 500,000 to 600,000 alarm systems will not be converted by the February 2008 Sunset date.

The record further shows that the vast majority of significant public safety organizations in the United States support a reasonable extension designed to protect these AMPS users, in recognition of the need to give safety priority over cost and other considerations. Among the public safety entities supporting such extension are:

- i. Association of Public Safety Communications Officials (APCO)
- ii. Fraternal Order of Police
- iii. International Association of Fire Chiefs (IAFC)
- iv. National Safety Council
- v. National Crime Prevention Council
- vi. Home Safety Council
- vii. Several women's shelters, law enforcement departments

Moreover, the Congressional Fire Services Institute has passed a March 30, 2007 Joint Resolution urging FCC to grant an extension. This organization exists to advise the Congressional Fire Services Caucus, and is made up of the 44 most important public fire safety entities in the country. See April 27, 2007 Ex Parte Notice of AICC and attached presentation at Item 11.

The record also shows that the radios of "secondary" AMPS customers (i.e., those with a telephone line in addition to their AMPS radio) should be replaced prior to the Sunset date, for the following reasons:

1. Phone lines are often cut by intruders, domestic abusers, or terrorists.
2. Snow, ice, wind, fire and falling branches all damage phone lines, causing outages when an emergency signal is most likely to be sent.
3. Carbon monoxide detection: When phone lines are down, power lines are generally down as well, causing people to use generators, kerosene lamps, and candles in their homes, leading to the threat of carbon monoxide poisoning.

4. Upon termination of AMPS service, many AMPS alarm devices will go into “trouble” mode, causing the alarm system to “beep” until replaced. This will lead to many unnecessary calls to public safety agencies by confused consumers, and will create an intolerable annoyance that will cause all affected customers to demand the immediate replacement of their AMPS unit – thus necessitating the sudden mass of truck rolls that the alarm industry does not have the resources to accomplish, necessitating their extension request to begin with.

5. For many businesses, a secondary radio system is a requirement for insurance purposes. Many businesses have insurance conditions placed upon them where they require different means for alarm signaling. Examples include jewelry businesses and businesses handling large amounts of cash. Loss of secondary signaling from AMPS radios will force them to close their doors or operate without insurance. The alarm industry is not privy to many businesses insurance policies.

Included as Attachment A hereto is an example of when the “secondary” AMPS communication line was crucial because the “primary” line did not work. It describes an alarm customer whose family was put at risk by a damaged ventilation system in their home, creating a silent threat of carbon monoxide poisoning. At the time this threat arose, the telephone line to the home was not working. If not for the “secondary” AMPS alarm unit in the home, the family may have lost their lives.<sup>2</sup>

At the same time, Petitioners are cognizant of concerns raised by the cellular industry, the Commission’s staff, and certain members of Congress. Among the chief concerns over extending the analog deadline are cost, the impact on the provision of digital services in rural America, and allowing cellular carriers to create more efficient digital capacity in those areas where their spectrum use is constrained by demand.

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<sup>2</sup> Due to privacy considerations, the customer does not wish to have the family’s name disclosed publicly. However, information about this subscriber will be provided on a confidential basis to the Commission, upon request.

Against these considerations, the Commission must weigh the public interest of safeguarding the safety of the millions of citizens whose electronic security systems utilize analog alarm radios that cannot be replaced by the current deadline. To address the concerns raised in the record in a way that minimizes any impact on cellular carriers, and based on the projected progress of the alarm industry's replacement efforts, Petitioners now propose a significantly streamlined and narrowly focused extension of the analog sunset, built around the following principles:

- The alarm industry will commit to convert incumbent analog alarm systems to digital by February 18, 2008 in the top 25 Metropolitan Statistical Areas (“MSAs”), which would free up analog spectrum resources in those areas where cellular carriers no doubt face the greatest spectrum constraints (given the fact that MSAs are ranked by population, so the twenty five largest MSAs should roughly reflect the largest clusters of cellular users).
- The Petitioners would forego any extension of the analog sunset date for Rural Service Areas (“RSAs”) and MSA306 (the Gulf of Mexico), as a compromise intended to narrow the scope of requested relief. Petitioners had already proposed in February 6, 2007 Reply Comments in the captioned proceedings (at pp. 35-36) a widespread rural exemption that would have applied to the vast majority of rural cellular operations. The new exemption for all RSAs would ensure that there is *zero* impact on the roll out of digital services in rural America due to Petitioners' proposed extension of the AMPS sunset.
- Petitioners would shorten the requested extension of the AMPS Sunset date from two years to only nine months (i.e., to November 18, 2008).

- Petitioners would narrow the scope of the proposed extension to only certain cellular markets, ranging from MSA No. 26 (the Phoenix, Arizona market) up to and including MSA No. 305 (the Alton-Granite City, Illinois market). Cellular carriers serving these “second and third tier” markets would be required to provide analog service to AMPS mobile telephones and AMPS alarm radios that were using their cellular system as of May 1, 2007,<sup>3</sup> regardless of whether these radios were considered “one way” or “fixed” by the cellular carriers. To prevent a frustration of the proposed extension through significant changes in price and service terms, the cellular carriers would be required to maintain the *status quo* with regard to service prices, terms, conditions and coverage during the nine month extension period.
- Petitioners stand by their proposal to exempt from the extension requirement any cellular system operating in an MSA in which AICC (acting as a Commission-appointed clearinghouse) certifies that there are no AMPS customers still requiring digital conversion at the time of the exemption request, or that the alarm companies serving that MSA indicate that they do not need additional time past February 2008.

The modified extension proposal offers several benefits. It would give the alarm industry a fighting chance to ensure that all or nearly all of the incumbent AMPS alarm systems are replaced with digital radios before the loss of AMPS service, so as to avoid

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<sup>3</sup> The use of a May 1, 2007 cut off would alleviate any concern by the cellular industry that AMPS units would be added to their systems during the extended sunset period.

any compromise in the protection of the affected consumers, businesses and government installations.

The timely conversion of the top 25 MSAs and all of the RSAs should free up analog spectrum where it is needed most by the cellular industry. The narrowing of the scope and duration of the AMPS extension should *drastically* reduce any costs for the cellular industry: A map showing the MSAs and RSAs to be converted by February 2008 (included as Attachment B hereto) shows that the vast majority of the country's geographic area would be exempt from any AMPS extension.<sup>4</sup> More importantly, the areas subject to the proposed extension (MSAs 26-305) contain only 39.6 percent of the United States population. See Attachment C hereto. Therefore, the Petitioners are now proposing to exempt *nearly two-thirds of the country's population (60.4 percent)* from the AMPS extension. Moreover, the new rural exemption would completely eliminate any impact on the rollout of digital service to rural areas, which was a particular concern of certain members of Congress as reflected in a May 4, 2007 letter to FCC Chairman Kevin J. Martin. And the exemption of the largest 25 and smallest 429 markets from any extension would provide cellular carriers with an *abundant* source of existing analog equipment with which to keep their networks going for nine months in the mid-sized MSAs.

Petitioners have submitted this revised proposal in a good faith attempt to respond to concerns raised in the record, while at the same time addressing the most important

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<sup>4</sup> Attachment B also provides maps purporting to show the cellular coverage of the Verizon Wireless and Cingular/AT&T cellular systems, for convenient reference. These coverage maps are the most current maps that Petitioners were able to locate online, but Petitioners cannot vouch for their accuracy.

concern of all – the safety of affected analog alarm users. Petitioners stand ready to consider modifications to their new proposal reasonably designed to achieve the goals described above, and would welcome input from the cellular industry in this regard.

## **II. Proposed Modified Wording of the Analog Cellular Sunset Rule**

In light of the above modifications to their proposal to extend the analog sunset, the Petitioners are requesting that the Commission revise the relevant portion of Rule Section 22.901(b) to read as follows:

(b) *Until November 18, 2008*, each cellular system providing service to Metropolitan Statistical Areas (“MSAs”) 26 through 305 shall --

(1) Maintain the capability to provide compatible analog service (“AMPS”) to cellular telephones and analog cellular alarm radios utilizing the cellular system as of May 1, 2007, throughout the areas covered by the cellular system’s CGSA as of that date;

(2) Continue providing AMPS, upon request, to subscribers and roamers using such cellular telephones and analog cellular alarm radios, under the same prices, terms and conditions provided as of May 1, 2007, while such subscribers are located in any portion of the cellular system’s CGSA. Such cellular licensees must allot sufficient system resources such that the quality of AMPS provided, in terms of geographic coverage and traffic capacity, is fully adequate to satisfy the need for AMPS availability as of May 1, 2007. A cellular system serving a Metropolitan Statistical Area (“MSA”) license area below the top 25 MSAs shall not be required to provide the AMPS capability beyond February 18, 2008 if it can verify with the affected alarm service providers and analog alarm clearinghouse that (1) there are no analog alarm customers within the MSA; or (2) that the affected alarm providers indicate that additional time is not needed for the transition of affected analog alarm customers within the cellular service area to alternative technologies.




### **Conclusion**

The Petitioners hereby request the Commission to extend the analog sunset date by an additional nine months, i.e., up to and including November 18, 2008, and incorporate the other terms and conditions of the modified extension plan described above. It is further requested that the Commission proceed with the proposed rule making on an expedited basis, so that alarm service providers will be able to scope and scale deployment of the massive resources needed to satisfy the AMPS transition.

Respectfully submitted,

**Alarm Industry Communications  
Committee**

**ADT Security Services, Inc.**

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## **Attachment A**

### **AMPS Customer Testimonial**

This past summer, when renovating my family's home, I called ADT Security Services, Inc. for a security review. I didn't think that we needed a security system, but my wife convinced me to call ADT - their system literally helped save our lives...we wouldn't be here if it weren't for that alarm system. As it turn's out, this was the most important call I ever made- it saved our lives.

My ADT representative presented a host of security options to meet my family's needs. We discussed the benefits of fire, smoke, carbon monoxide detection, cellular back-up in addition to a burglar alarm. Prior to this meeting, I hadn't given much consideration to such an inclusive monitored security system. Now I consider it essential.

One morning about a week after moving into our home, we turned on the heat for the first time. An hour and a half later the ADT carbon monoxide detector went off. While my wife and I discussed getting our young children dressed, my cell phone rang. It was ADT alerting me that there were high levels of carbon monoxide in our house and that we should evacuate immediately. They had dispatched the fire department.

Without the ADT detector and the call from the ADT monitoring center, we probably wouldn't be here today.

The carbon monoxide in our house was the result of a construction error. To compound this, after ADT had installed our alarm system another company had disconnected the phone line from the alarm panel. Therefore, our alarm panel could not send a signal to ADT's Monitoring Center over the phone lines. Fortunately, we had installed ADT's cellular back-up. When the high levels of carbon monoxide were detected in our home, our cellular back-up system communicated with ADT and ADT contacted us.

Although accidents and the unforeseen can happen, I want to protect my family as much as possible. Many thanks to ADT for working to help protect my family.

All it takes is one time and you're glad you've got ADT, we wouldn't be here without it.

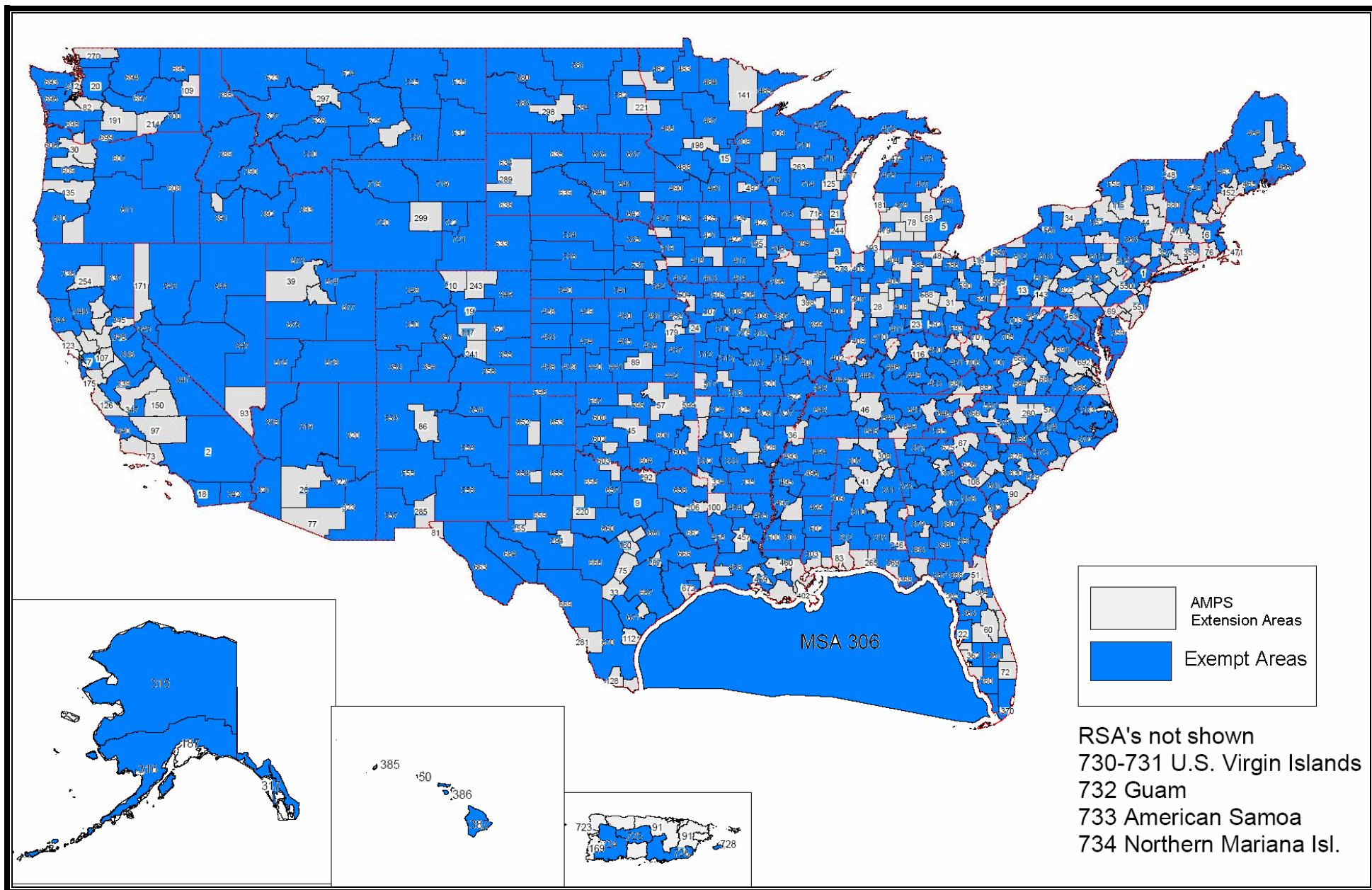
ADT protection is more than just a security system...it's peace of mind that can also help save your life.

ADT Custom Home Services Client  
Long Island, NY  
December, 2006

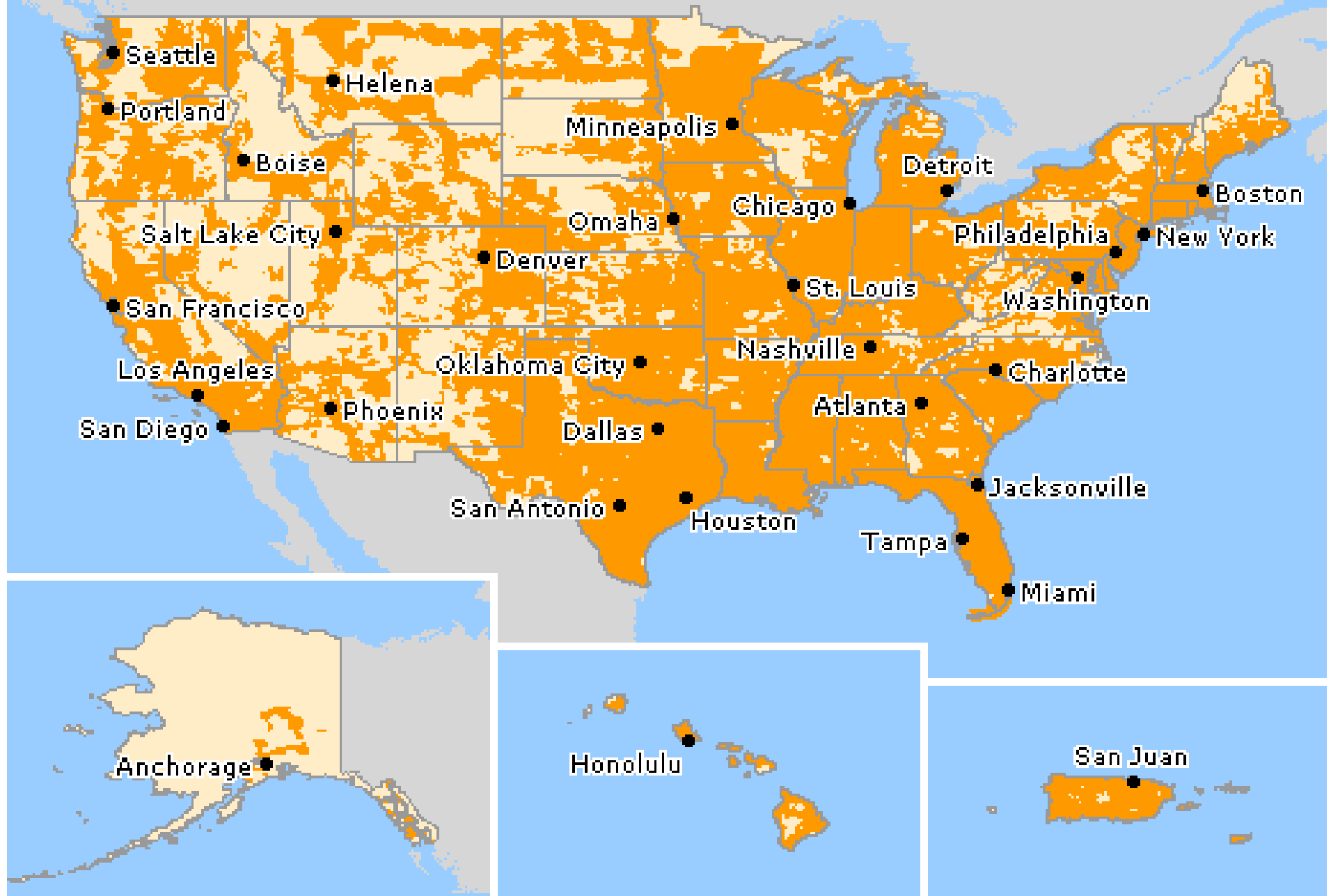
## **Attachment B**

### **Revised AMPS Extension Plan**

- **Areas subject to nine month extension shown in gray**
- **Areas exempt from extension shown in blue**
- **Cingular and Verizon Coverage Maps attached for convenience**



## Coverage Map from Cingular Website

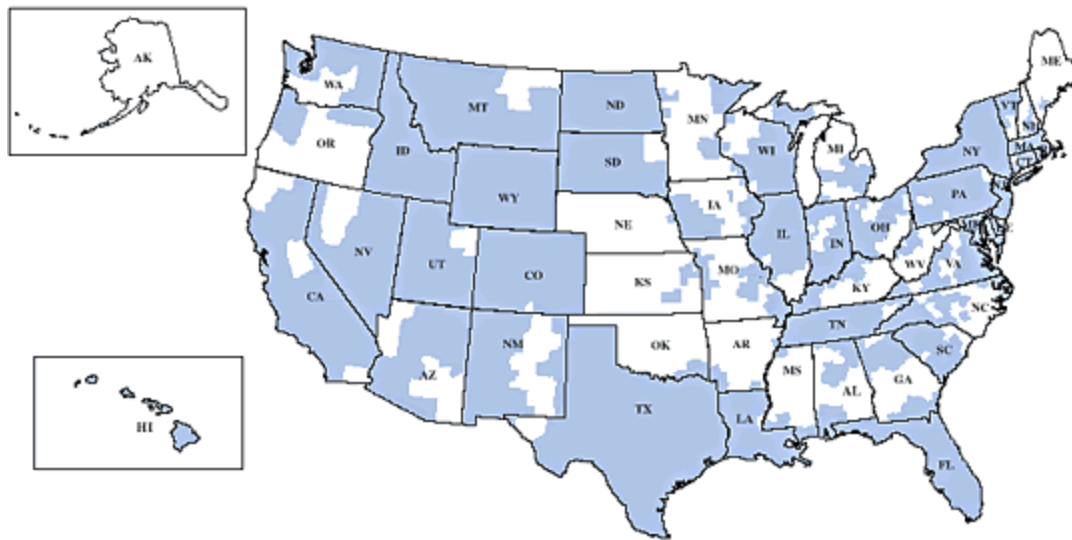


# Verizon Wireless Coverage Map

## NATIONAL COVERAGE

### Nationwide Licensed Service Areas

■ Licensed Markets      □ Roaming Markets



This national wireless coverage map shows the locations you may use your digital wireless cellular phone within the USA.

This map was prepared by Strategis Group, Inc., for use by B-system cellular carriers in the U.S. and Canada, and generally depicts the service area boundaries of B-system service carriers in each of the 50 States and Canada.

## Attachment C

Market Number	Market Name	2000 census
MSA001	New York-Newark, NY-NJ	16,134,166
MSA002	Los Angeles-Anaheim, CA	15,620,448
MSA003	Chicago, IL	8,091,720
MSA004	Philadelphia, PA	5,036,646
MSA005	Detroit-Ann Arbor, MI	4,775,452
MSA006	Boston-Brockton-Lowell, MA-NH	4,279,111
MSA007	San Francisco-Oakland, CA	4,123,740
MSA008	Washington, DC-MD-VA	4,182,658
MSA009	Dallas-Fort Worth, TX	5,120,721
MSA010	Houston, TX	4,393,382
MSA011	St. Louis, MO-IL	2,518,470
MSA012	Miami-Fort Lauderdale, FL	3,876,380
MSA013	Pittsburgh, PA	2,035,968
MSA014	Baltimore, MD	2,512,431
MSA015	Minneapolis-St. Paul, MN-WI	2,836,298
MSA016	Cleveland, OH	1,863,479
MSA017	Atlanta, GA	3,751,674
MSA018	San Diego, CA	2,813,833
MSA019	Denver-Boulder, CO	2,405,327
MSA020	Seattle-Everett, WA	2,343,058
MSA021	Milwaukee, WI	1,500,741
MSA022	Tampa-St. Petersburg, FL	2,265,195
MSA023	Cincinnati, OH-KY-IN	1,553,843
MSA024	Kansas City, MO-KS	1,627,081
MSA025	Buffalo, NY	1,170,111
106,831,933 Total POPs for MSAs 001 - 025		
MSA026	Phoenix, AZ	3,072,149
MSA027	San Jose, CA	1,682,585
MSA028	Indianapolis, IN	1,474,128
MSA029	New Orleans, LA	1,198,637
MSA030	Portland, OR-WA	1,789,457
MSA031	Columbus, OH	1,394,666
MSA032	Hartford-Bristol, CT	1,148,618
MSA033	San Antonio, TX	1,559,975
MSA034	Rochester, NY	1,037,831
MSA035	Sacramento, CA	1,640,558
MSA036	Memphis, TN-AR-MS	1,106,808
MSA037	Louisville, KY-IN	968,313
MSA038	Providence-Warwick, RI	962,886
MSA039	Salt Lake City-Ogden, UT	1,374,649
MSA040	Dayton, OH	848,153
MSA041	Birmingham, AL	940,795
MSA042	Bridgeport-Stamford-Danbury CT	882,567
MSA043	Norfolk-Virginia Beach, VA-NC	1,041,276
MSA044	Albany-Schenectady-Troy, NY	844,001
MSA045	Oklahoma City, OK	1,049,422
MSA046	Nashville-Davidson, TN	1,231,311
MSA047	Greensboro-Winston-Salem, NC	1,085,874
MSA048	Toledo, OH-MI	805,133
MSA049	New Haven-Waterbury-Meriden CT	824,008
MSA050	Honolulu, HI	876,156
MSA051	Jacksonville, FL	1,122,750
MSA052	Akron, OH	694,960
MSA053	Syracuse, NY	650,154
MSA054	Gary-Hammond-East Chicago, IN	631,362
MSA055	Worcester-Leominster, MA	750,963
MSA056	Northeast Pennsylvania, PA	671,232

## Attachment C

MSA057	Tulsa, OK	841,604
MSA058	Allentown-Bethlehem, PA-NJ	740,395
MSA059	Richmond, VA	865,941
MSA060	Orlando, FL	1,434,033
MSA061	Charlotte-Gastonia, NC	1,009,496
MSA062	New Brunswick-Perth Amboy, NJ	750,162
MSA063	Springfield-Holyoke, MA	608,479
MSA064	Grand Rapids, MI	812,649
MSA065	Omaha, NE-IA	673,884
MSA066	Youngstown-Warren, OH	482,671
MSA067	Greenville-Spartanburg, SC	744,164
MSA068	Flint, MI	507,828
MSA069	Wilmington, DE-NJ-MD	650,501
MSA070	Long Branch-Asbury Park, NJ	615,301
MSA071	Raleigh-Durham, NC	969,387
MSA072	West Palm Beach-Boca Raton, FL	1,131,184
MSA073	Oxnard-Simi Valley-Ventura, CA	753,197
MSA074	Fresno, CA	799,407
MSA075	Austin, TX	1,159,836
MSA076	New Bedford-Fall River, MA	534,678
MSA077	Tucson, AZ	843,746
MSA078	Lansing-East Lansing, MI	509,246
MSA079	Knoxville, TN	576,993
MSA080	Baton Rouge, LA	602,894
MSA081	El Paso, TX	679,622
MSA082	Tacoma, WA	700,820
MSA083	Mobile, AL	540,258
MSA084	Harrisburg, PA	509,074
MSA085	Johnson City-Kingsport, TN-VA	480,091
MSA086	Albuquerque, NM	646,586
MSA087	Canton, OH	406,934
MSA088	Chattanooga, TN-GA	476,531
MSA089	Wichita, KS	512,351
MSA090	Charleston, SC	549,033
MSA091	San Juan-Caguas, PR	2,176,135
MSA092	Little Rock, AR	583,845
MSA093	Las Vegas, NV	1,375,765
MSA094	Saginaw-Bay City-Midland, MI	403,070
MSA095	Columbia, SC	536,691
MSA096	Fort Wayne, IN	464,066
MSA097	Bakersfield, CA	661,645
MSA098	Davenport-Rock Island, IA-IL	359,062
MSA099	York, PA	473,043
MSA100	Shreveport, LA	392,302
MSA101	Beaumont-Port Arthur, TX	385,090
MSA102	Des Moines, IA	456,022
MSA103	Peoria, IL	347,387
MSA104	Newport News-Hampton, VA	489,330
MSA105	Lancaster, PA	470,658
MSA106	Jackson, MS	440,801
MSA107	Stockton, CA	563,598
MSA108	Augusta, GA-SC	452,846
MSA109	Spokane, WA	417,939
MSA110	Huntington-Ashland, WV-KY-OH	315,538
MSA111	Vallejo-Fairfield-Napa, CA	518,821
MSA112	Corpus Christi, TX	380,783
MSA113	Madison, WI	426,526



## Attachment C

MSA114	Lakeland-Winter Haven, FL	483,924
MSA115	Utica-Rome, NY	299,896
MSA116	Lexington-Fayette, KY	408,326
MSA117	Colorado Springs, CO	537,484
MSA118	Reading, PA	373,638
MSA119	Evansville, IN-KY	328,695
MSA120	Huntsville, AL	424,607
MSA121	Trenton, NJ	350,761
MSA122	Binghamton, NY	294,558
MSA123	Santa Rosa-Petaluma, CA	458,614
MSA124	Santa Barbara, CA	399,347
MSA125	Appleton-Oskosh-Neenah, WI	358,365
MSA126	Salinas-Seaside-Monterey, CA	401,762
MSA127	Pensacola, FL	412,153
MSA128	McAllen-Edinburg-Mission, TX	569,463
MSA129	South Bend-Mishawaka, IN	310,687
MSA130	Erie, PA	280,843
MSA131	Rockford, IL	320,204
MSA132	Kalamazoo, MI	314,866
MSA133	Manchester-Nashua, NH	380,841
MSA134	Atlantic City, NJ	354,878
MSA135	Eugene-Springfield, OR	322,959
MSA136	Lorain-Elyria, OH	284,664
MSA137	Melbourne-Titusville, FL	476,230
MSA138	Macon-Warner Robins, GA	322,549
MSA139	Montgomery, AL	333,055
MSA140	Charleston, WV	251,662
MSA141	Duluth, MN-WI	243,815
MSA142	Modesto, CA	446,997
MSA143	Johnstown, PA	232,621
MSA144	Orange County, NY	341,367
MSA145	Hamilton-Middletown, OH	332,807
MSA146	Daytona Beach, FL	443,343
MSA147	Ponce, PR	264,919
MSA148	Salem, OR	347,214
MSA149	Fayetteville, NC	302,963
MSA150	Visalia-Tulare-Porterville, CA	368,021
MSA151	Poughkeepsie, NY	280,150
MSA152	Portland, ME	300,826
MSA153	Columbus, GA-AL	250,929
MSA154	New London-Norwich, CT	259,088
MSA155	Savannah, GA	293,000
MSA156	Portsmouth-Rochester, NH-ME	298,975
MSA157	Roanoke, VA	241,023
MSA158	Lima, OH	219,469
MSA159	Provo-Orem, UT	368,536
MSA160	Killeen-Temple, TX	312,952
MSA161	Lubbock, TX	242,628
MSA162	Brownsville-Harlingen, TX	335,227
MSA163	Springfield, MO	294,676
MSA164	Fort Myers, FL	440,888
MSA165	Fort Smith AR-OK	255,399
MSA166	Hickory, NC	264,436
MSA167	Sarasota, FL	325,957
MSA168	Tallahassee, FL	307,402
MSA169	Mayaguez, PR	227,412
MSA170	Galveston-Texas City, TX	250,158

## Attachment C

MSA171	Reno, NV	339,486
MSA172	Lincoln, NE	250,291
MSA173	Biloxi-Gulfport, MS	246,190
MSA174	Lafayette, LA	239,086
MSA175	Santa Cruz, CA	255,602
MSA176	Springfield, IL	201,437
MSA177	Battle Creek, MI	194,740
MSA178	Wheeling, WV-OH	153,172
MSA179	Topeka, KS	205,009
MSA180	Springfield, OH	183,632
MSA181	Muskegon, MI	197,073
MSA182	Fayetteville-Springdale, AR	311,121
MSA183	Asheville, NC	225,965
MSA184	Houma-Thibodaux, LA	194,477
MSA185	Terre Haute, IN	170,943
MSA186	Green Bay, WI	226,778
MSA187	Anchorage, AK	260,283
MSA188	Amarillo, TX	217,858
MSA189	Racine, WI	188,831
MSA190	Boise City, ID	300,904
MSA191	Yakima, WA	222,581
MSA192	Gainesville, FL	244,043
MSA193	Benton Harbor, MI	162,453
MSA194	Waco, TX	213,517
MSA195	Cedar Rapids, IA	191,701
MSA196	Champaign-Urbana-Rantoul, IL	179,669
MSA197	Lake Charles, LA	183,577
MSA198	St. Cloud, MN	231,809
MSA199	Steubenville-Weirton, OH-WV	132,008
MSA200	Parkersburg-Marietta, OH-WV	157,110
MSA201	Waterloo-Cedar Falls, IA	151,337
MSA202	Arecibo, PR	199,750
MSA203	Lynchburg, VA	161,946
MSA204	Aguadilla, PR	190,868
MSA205	Alexandria, LA	145,035
MSA206	Longview-Marshall, TX	173,489
MSA207	Jackson, MI	158,422
MSA208	Fort Pierce, FL	319,426
MSA209	Clarksville-Hopkinsville TN-KY	207,033
MSA210	Fort Collins-Loveland, CO	251,494
MSA211	Bradenton, FL	264,002
MSA212	Bremerton, WA	231,969
MSA213	Pittsfield, MA	134,953
MSA214	Richland-Kennewick-Pasco, WA	191,822
MSA215	Chico, CA	203,171
MSA216	Janesville-Beloit, WI	152,307
MSA217	Anderson, IN	133,358
MSA218	Wilmington, NC	233,450
MSA219	Monroe, LA	147,250
MSA220	Abilene, TX	160,245
MSA221	Fargo-Moorehead, ND-MN	174,367
MSA222	Tuscaloosa, AL	164,875
MSA223	Elkhart-Goshen, IN	182,791
MSA224	Bangor, ME	144,919
MSA225	Altoona, PA	129,144
MSA226	Florence, AL	142,950
MSA227	Anderson, SC	165,740

## Attachment C

MSA228	Vineland-Millville, NJ	146,438
MSA229	Medford, OR	181,269
MSA230	Decatur, IL	114,706
MSA231	Mansfield, OH	128,852
MSA232	Eau Claire, WI	148,337
MSA233	Wichita Falls, TX	142,670
MSA234	Athens, GA	195,033
MSA235	Petersburg-Hopewell, VA	130,571
MSA236	Muncie, IN	118,769
MSA237	Tyler, TX	174,706
MSA238	Sharon, PA	120,293
MSA239	Joplin, MO	157,322
MSA240	Texarkana, AR-TX	143,377
MSA241	Pueblo, CO	141,472
MSA242	Olympia, WA	207,355
MSA243	Greeley, CO	180,936
MSA244	Kenosha, WI	149,577
MSA245	Ocala, FL	258,916
MSA246	Dothan, AL	137,916
MSA247	Lafayette, IN	148,955
MSA248	Burlington, VT	153,472
MSA249	Anniston, AL	112,249
MSA250	Bloomington-Normal, IL	150,433
MSA251	Williamsport, PA	120,044
MSA252	Pascagoula, MI	131,420
MSA253	Sioux City, IA-NE	124,130
MSA254	Redding, CA	163,256
MSA255	Odessa, TX	121,123
MSA256	Charlottesville, VA	159,576
MSA257	Hagerstown, MD	131,923
MSA258	Jacksonville, NC	150,355
MSA259	State College, PA	135,758
MSA260	Lawton, OK	114,996
MSA261	Albany, GA	120,822
MSA262	Danville, VA	110,156
MSA263	Wausau, WI	125,834
MSA264	Florence, SC	125,761
MSA265	Fort Walton Beach, FL	170,498
MSA266	Glens Falls, NY	124,345
MSA267	Sioux Falls, SD	148,281
MSA268	Billings, MT	129,352
MSA269	Cumberland, MD-WV	102,008
MSA270	Bellingham, WA	166,814
MSA271	Kokomo, IN	101,541
MSA272	Gadsden, AL	103,459
MSA273	Kankakee, IL	103,833
MSA274	Yuba City, CA	139,149
MSA275	St. Joseph, MO	102,490
MSA276	Grand Forks, ND-MN	97,478
MSA277	Sheboygan, WI	112,646
MSA278	Columbia, MO	135,454
MSA279	Lewiston-Auburn, ME	103,793
MSA280	Burlington, NC	130,800
MSA281	Laredo, TX	193,117
MSA282	Bloomington, IN	120,563
MSA283	Panama City, FL	148,217
MSA284	Elmira, NY	91,070

## Attachment C

MSA285	Las Cruces, NM	174,682
MSA286	Dubuque, IA	89,143
MSA287	Bryan-College Station, TX	152,415
MSA288	Rochester, MN	124,277
MSA289	Rapid City, SD	112,818
MSA290	La Crosse, WI	107,120
MSA291	Pine Bluff, AR	84,278
MSA292	Sherman-Denison, TX	110,595
MSA293	Owensboro, KY	91,545
MSA294	San Angelo, TX	104,010
MSA295	Midland, TX	116,009
MSA296	Iowa City, IA	111,006
MSA297	Great Falls, MT	80,357
MSA298	Bismarck, ND	94,719
MSA299	Casper, WY	66,533
MSA300	Victoria, TX	84,088
MSA301	Lawrence, KS	99,962
MSA302	Enid, OK	57,813
MSA303	Aurora-Elgin, IL	54,544
MSA304	Joliet, IL	37,535
MSA305	Alton-Granite City, IL	21,668
		112,995,807 Total POPs for MSAs 026 - 305

Total US POPs per 2000 Census 285,620,445

% of population in CMA Markets 1-25 37.4%  
 % of population in CMA Markets 26-305 39.6%

Total US POPs for CMA Markets 305-734 65,792,705  
 % of population in CMA Markets 305-734 23.0%

**% of population EXEMPT from extension 60.4%**

NOTE: 2000 Census data is based upon the Census Bureaus Census 2000 SF1 file supplemented with the News Releases for the territories and protectorates released in July 2001. See FCC OET web site.